

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

MAYOR AND CITY COUNCIL OF  
BALTIMORE, *et al.*,

*Plaintiffs,*

vs.

CONSUMER FINANCIAL  
PROTECTION BUREAU, *et al.*,

*Defendants.*

Case No. 1:25-cv-00458-MJM

---

**PLAINTIFFS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL DECLARATION**

Pursuant to Federal Rule of Civil Procedure 7(b), Plaintiffs Mayor and City Council of Baltimore and Economic Action Maryland Fund respectfully move for leave to file a supplemental declaration for the Court's consideration. As set forth in the accompanying memorandum, this supplemental declaration will aid the Court in its consideration of Plaintiffs' pending motion for a preliminary injunction.

Dated: March 2, 2025

Respectfully submitted,

/s/ Mark B. Samburg

Mark B. Samburg

Kevin E. Friedl\*

Jessica Anne Morton\*

Daniel McGrath\*

J. Sterling Moore\*

Robin F. Thurston\*

Skye L. Perryman\*

Democracy Forward Foundation

P.O. Box 34553

Washington, DC 20043

(202) 448-9090

msamburg@democracyforward.org

kfriedl@democracyforward.org

jmorton@democracyforward.org

dmcgrath@democracyforward.org

smoore@democracyforward.org

rthurston@democracyforward.org

sperryman@democracyforward.org

*Counsel for Plaintiffs*

\*Admitted *pro hac vice*